



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

March 24, 2021

*Via Electronic Mail*

Devin T. Ryan, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dryan@postschell.com](mailto:dryan@postschell.com)

Re: Pennsylvania Public Utility Commission v.  
UGI Utilities, Inc. – Electric Division  
Docket No.: R-2021-3023618  
**I&E Interrogatories**

Dear Attorney Ryan:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatories I&E-RE-71 through I&E-RE-73 – Zalesky** for the above referenced docket. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within ten (10) calendar days pursuant to the discovery modifications approved by ALJ Haas at the March 22, 2021 Prehearing Conference. Please provide your responses via email to the email address listed below.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'John M. Coogan', with a long horizontal flourish extending to the right.

John M. Coogan  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 313920  
(717) 783-6151  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)

JMC/ac  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No.: R-2021-3023618  
 :  
 UGI Utilities, Inc. – Electric Division :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories** dated March 24, 2021, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Devin T. Ryan, Esq.  
Garrett P. Lent, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dryan@postschell.com](mailto:dryan@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
*Counsel for*  
*UGI Utilities, Inc – Electric Division*

David B. MacGregor, Esq.  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
*Counsel for*  
*UGI Utilities, Inc – Electric Division*

Kent Murphy, Esq.  
Michael S. Swerling, Esq.  
Danielle Jouenne, Esq.  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
[murphyke@ugicorp.com](mailto:murphyke@ugicorp.com)  
[swerlingm@ugicorp.com](mailto:swerlingm@ugicorp.com)  
[jouenned@ugicorp.com](mailto:jouenned@ugicorp.com)  
*Counsel for*  
*UGI Utilities, Inc – Electric Division*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CEO*

James M. Van Nostrand, Esq.  
Keyes & Fox LLP  
320 Fort Duquesne Blvd, #15K  
Pittsburgh, PA 15222  
[jvannostrand@keyesfox.com](mailto:jvannostrand@keyesfox.com)  
*Counsel for ChargePoint, Inc.*

Scott F. Dunbar, Esq.  
Keyes & Fox LLP  
1580 Lincoln Street, Suite 1105  
Denver, CO 80203  
[sdunbar@keyesfox.com](mailto:sdunbar@keyesfox.com)  
*Counsel for ChargePoint, Inc.*

Deanne O'Dell, Esq.  
Sarah C. Stoner, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street , 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)  
*Counsel for RESA and NRG*

Cody T. Murphey, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
919 E. Main Street, Suite 1300  
Richmond, VA 23219  
[cmurphey@eckertseamans.com](mailto:cmurphey@eckertseamans.com)  
*Counsel for RESA and NRG*

Steven C. Gray, Esq.  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)

Luis M. Melendez, Esq.  
Darryl A. Lawrence, Esq.  
Phillip D. Demanchick, Esq.  
Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[OCAUGIElectric2021@paoca.org](mailto:OCAUGIElectric2021@paoca.org)

Jennifer Mattingly  
1419 Oak Drive  
Shavertown, PA 18708  
[Jcamatt3@aol.com](mailto:Jcamatt3@aol.com)  
*Complainant*

Brandi Brace  
114 Hartman Road  
Hunlock Creek, PA 18621  
[BrandiBrace@protonmail.com](mailto:BrandiBrace@protonmail.com)  
*Complainant*



---

John M. Coogan  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 313920